

UNITED STATES DISTRICT COURT

EASTERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

EXHIBIT AND WITNESS LIST

V.

ALEXANDRU BITTNER

Case Number: 19-CV-0415

PRESIDING JUDGE HONORABLE AMOS L. MAZZANT					PLAINTIFF'S ATTORNEY HERB LINDER	DEFENDANT'S ATTORNEY Rachael Rubenstein, Farley Katz
TRIAL DATE (S)					COURT REPORTER	COURTROOM DEPUTY
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
1					Defendant Alexndru Bittner's ("Bittner") Amended 2007 FBAR	
2					Bittner's Amended 2008 FBAR	
3					Bittner's Amended 2009 FBAR	
4					Bittner's Amended 2010 FBAR	
5					Bittner's Amended 2011 FBAR	
10					Consent to Extend the time to Assess Civil Penalties for FBAR Violations	
11					Consent to Extend the time to Assess Civil Penalties for FBAR Violations	
12					Consent to Extend the time to Assess Civil Penalties for FBAR Violations	
13					Consent to Extend the time to Assess Civil Penalties for FBAR Violations	
14					Consent to Extend the time to Assess Civil Penalties for FBAR Violations	
15					Consent to Extend the time to Assess Civil Penalties for FBAR Violations	
16					Consent to Extend the time to Assess Civil Penalties for FBAR Violations	
19					Bittner's letter to the IRS with Bittner's federal tax returns for the 1990-2011 years	
20					Bittner's UniCredit Tiriack Bank foreign ("RON") account in Romania account statements	
21					Bittner's UniCredit Tiriack Bank foreign ("USD") account in Romania account statements	
22					Bittner's UniCredit Tiriack Bank foreign ("EURO") account in Romania account statements	
23					Bittner's Raiffeisen Bank accounts statements for bank in Romania,	
24					Bittner's Lichteinsteinische Landesbank numbered account statements	
25					Bittner's Royal Bank of Canada foreign account in Switzerland account statements	
26					Bittner's Royal Bank of Canada foreign account in Switzerland account statements	
27					Bittner's Royal Bank of Canada foreign account in Switzerland account statements	
30					List of Bittner's personal foreign bank accounts	

* Include a notation as to the location of any exhibit not held with the case file or not available because of size.

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EXHIBIT AND WITNESS LIST – CONTINUATION

UNITED STATES vs. ALEXANDRU BITTNER					CASE NO. 01-CV-0415
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
31					Bittner's an income and bank balance chart
35					Bittner's original FBARs for the 1996-2011 years
36					Letter provided to the IRS with Bittner's federal tax returns for the 1990-2011 years
37					Bittner's letter to the IRS with Bittner's 1996-2011 FBARs
38					Reasonable cause statement provided to IRS by Bittner around 9/12/2013
39					Bittner's reasonable cause statement provided to IRS around 2/19/2014
40					Bittner's certification statement
41					Bittner's amended 2006 FBAR
42					Schedules of foreign bank accounts that was attached to Bittner's amended FBARs
43					List of Bittner's entities
47					Chart of Bittner's personal foreign bank accounts with bank balances
48					Foreign bank accounts that he has an interest in with high accounts balances
51					Meeting notes of Jeff Beckley
52					Notes to file of Jeff Beckley
56					typed electronic version of Bittner's original FBARs for 2003-2011
57					Bittner's Finansbank account statements, bank located in Romania
58					Bittner's Banque SCS Alliance in account statements, located in Geneva
59					Bittner's Lichteinsteinische Landesbank numbered account in Liechtenstein for USD.
60					Defendant's Responses to the United States' Request for Admissions
61					Certified Transcripts for the assessment of FBAR penalties against Bittner
62					Form 13449 Agreement to Assessment and Collection of Penalties
63					IRS Form 3709 letter to Bitner regarding FBAR assessments with Form 886-A Agent's report
65					Revenue Agents' calculations of aggregate balances in Bittner's foreign accounts
66					Global re Limited financial statements
67					IRS transcripts for Bittner's 1990, 1991 and 1997-2000 tax years
70					Decision document from Bittner's Tax Court case Docket No. 19894-17
75					IRS transcripts for Defendant Bittner's 1987-1989 tax years

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PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
76					Blank copy of 1988 Form 1040 tax return
77					Blank copy of 1989 Form 1040 tax return
78					1988 Schedule A/B
79					1989 Schedule A/B
80					Bittner's 1990 tax return
81					1988 Form 1040 tax return instructions for Schedule B
82					1989 Form 1040 tax return instructions for Schedule B
83					1990 Form 1040 tax return instructions for Schedule B
84					1991 Form 1040 tax return instructions for Schedule B
85					1997 Form 1040 tax return instructions for Schedule B
86					1998 Form 1040 tax return instructions for Schedule B
87					1999 Form 1040 tax return instructions for Schedule B
88					2000 Form 1040 tax return instructions for Schedule B
89					1996 Publication 54, titled "Tax Guide for U.S. Citizens and Resident Aliens Abroad"
90					1997 Publication 54, titled "Tax Guide for U.S. Citizens and Resident Aliens Abroad"
91					1998 Publication 54, titled "Tax Guide for U.S. Citizens and Resident Aliens Abroad"
92					1999 Publication 54, titled "Tax Guide for U.S. Citizens and Resident Aliens Abroad"
93					2000 Publication 54, titled "Tax Guide for U.S. Citizens and Resident Aliens Abroad"
94					Bittner's 2004 and 2005 amended FBARs.
95					IRS transcripts for bittner's 1983-1986
96					1993- 2001 FBAR transcripts
97					Bittner's 1991, 1997-2000 imfol transcripts
98					Copy of the U.S. Embassy in Romania Registration Form for the years 2004-08.
99					Nevada Secretary of State records of entity information for ROCALTEX
100					Certificate of Formation of Romark Management LLC.
101					Certificate of Formation of SunTex Investments LLC.
102					a Snapshot of U.S. Embassy website from 2009 from Wayback.com with linked attachment.

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PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
103					Publication 54 for 2009
104					Publication 54 for 2010
105					Draft copy of Bittner's 1991 return
106					Romanian Embassy American Citizen Services eNewsletter from March 2011
107					Romanian Embassy American Citizen Services eNewsletter from April 2011
108					POA September 24, 2014, letter to Revenue Agent
109					Certified transcript of total due for the FBAR penalties.
110					Wayback.com snapshot of U.S. Embassy website from 2008 with linked attachment of registration
111					Wayback.com snapshot of U.S. Embassy website from 2004with linked attachment of registration
112					Wayback.com snapshot of U.S. Embassy website from 2005 with linked attachment of registration
113					Bittner's original 2007 Form 1040 return
114					Bittner's original 2008 Form 1040 return
115					Bittner's original 2009 Form 1040 return
116					Bittner's original 2010 Form 1040 return
117					Bittner's original 2011 Form 1040 return
118					Bittner's Amended 2007 Form 1040X
119					Bittner's Amended 2008Form 1040X
120					Bittner's Amended 2009 Form 1040X
121					Bittner's Amended 2010 Form 1040X
122					Bittner's Amended 2011 Form 1040X
123					Letter 5143, dated 10/03/18
124					Letter 3708, dated 6/08/17
125					Agent's FBAR non-willful penalty lead sheet
126					Appeals officer's memo
127					Bittner 2011 tax organizer
128					Bittner's original 1992 Form 1040
129					Bittner's original 1993 Form 1040

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PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
130					Bittner's original 1994 Form 1040
131					Bittner's original 1995 Form 1040
132					Bittner's original 1996 Form 1040
133					Bittner's original 1997 Form 1040
134					Bittner's original 1998 Form 1040
135					Bittner's original 1999 Form 1040
136					Bittner's original 2000 Form 1040
137					Bittner's original 2001 Form 1040
138					Bittner's original 2002 Form 1040
139					Bittner's original 2003 Form 1040
140					Bittner's original 2004Form 1040
141					Bittner's original 2005 Form 1040
142					Bittner's original 2006 Form 1040
143					Bittner's chart of income and other items
144					currency transaction report dated 8/10/2007
145					currency transaction report dated 8/9/2007
146					Letter dated September 26, 2012, from the IRS
147					Form 433 submitted by Alexandru Bittner
148					2007-2011 FBAR transcripts from FinCen
149					2011 FBAR with instructions
150					2011 Piraeus bank statements
6					copy of Bittner's Form 2848